

EXHIBIT A

Honorable William G. Young
United States District Judge for the District of Massachusetts

Dear Judge Young,

I worked closely with Veronica Zea from October 2017 to December 2018. I was also an intelligence analyst contracted to work at eBay at the Global Intelligence Center (GIC). During this period, I experienced a toxic and manipulative work environment under Jim Baugh, Dave Harville and Stephanie Popp (leadership). Over the course of my tenure at eBay, leadership continually tested our loyalties and erased our boundaries through intentionally psychologically manipulating us. The environment they created was cult-like and scary, so much so that when I watched a recently popular documentary on the NXIVM cult I was immediately reminded of my time at eBay and recognized a number of tactics that Jim had employed on us. That is why when I heard of the incident, I was in no way shocked. Through a combination of breaking us down psychologically, lying to us, and veiled threats of blackmail, I can understand how Veronica was coerced into participating. Though there is no question if it was ethically wrong, I urge you to take into consideration the extreme environment this occurred in and the deteriorating mental state working under leadership put us in. I consider myself a highly ethical person and outstanding citizen but still cannot say with total certainty that given the same circumstances I would have been strong enough to act differently. I left eBay long before the incident being tried now, but I can provide a few of the countless examples illustrating the toxic work environment.

All of the analysts were fresh out of college or graduate school, and for most of us this was our first career-oriented job. We had little to no context for what a normal work culture was like and leadership took advantage of that. The job was extremely demanding; they erased any semblance of personal boundaries. Depending upon who was in his "circle of trust" at the time, which he'd tell us explicitly, Jim would intentionally subject us to anxiety-inducing situations. Analysts who were 'in' at the time got longer lunch breaks, to come in late, better work assignments or to go out drinking with leadership during work. Analysts who were 'out' were given the silent treatment, given overnight shifts and then expected to work the next day, or ridiculed in front of the entire department. He'd pull us into his connected office (dubbed The War Room) and laugh as he told us that he had called Lauren (our manager) 10 times overnight just to keep her from sleeping. Many times we found her crying in our office and Jim would congratulate himself of "making her crack". When she was let go, Jim admitted that he had been putting her in these situations on purpose for nearly six months for his own enjoyment. It seemed clear to me that he had no personal life; Jim told us he rarely was home and that we were his "real family". Many times, he called himself our 'Dad' and cast himself as a protective father to us, all 20-something female analysts. He would tell us how all other men were awful besides him by trying to convince us of false claims that our boyfriends were cheating on us or that other male staff made sexist comments about us behind our back.

In hindsight, it is obvious they made having a personal life impossible so that our job and the GIC was all we had. Simultaneously, leadership made it clear we were constantly on the chopping block, no matter how small the mistake. Jim would make us practice firing one another and urged us to point out each other's professional and personal flaws while doing so. He frequently commented how we were "dead to him" if we got another job and told us that, because of his connections, if we even applied to another security job he would know (and then fire us for our lack of loyalty). Another former analyst shared with me that after telling leadership she quit, they made threats to her safety via thinly veiled claims that they would send someone to hurt her because of the things she knew. While threatening us with the repercussions of job searching, Jim would also tell us almost weekly how the GIC was "Disneyland" and were incredibly lucky to be on a world class team. He promised us that if we were loyal to him, he would help us get any job we wanted as long as we had his blessing and even offered to pull strings at the CIA and State Department where he claimed to have connections. Jim and Dave told us they was protecting us from the sexist world of security while constantly making inappropriate sexual comments about our appearance, age, etc.

It was a fear-driven and punitive environment where minor errors became cause for humiliation and punishment. One time an analyst accidentally brought an office satellite phone home with her and leadership planned an elaborate prank that eBay's CEO was in a plane crash and died because of her mistake. They routinely subjected us to drills which they claimed was to test our preparedness. In reality, it was to convey their power over us, humiliate and scare us. Some included active shooter drills where leadership would pretend to shoot us in the middle of eBay's campus for all staff to watch, or earthquake drills where they would blast airhorns in our ears while timing our response to write an email with no grammatical errors. Another time, an analyst forgot to lock their locker so leadership instructed a security guard to empty our locker belongings into clear trash bags while we all stood in a line and watched. The trash bags sat in the corner of our office for the day while leadership mocked what we had in our lockers before we were allowed to have our things back. Leadership went out of our way to make us feel awful and for the majority of my tenure there I feared the sight of them. Because we were contractors via Concentric, we did not have access to eBay's own HR and leadership affectively blocked our communications to Concentric. A former analyst asked to speak with HR about our work conditions and was immediately let go. Once staff within Concentric learned about our work environment and asked to speak with our leadership, Jim immediately terminated Concentric's contract with eBay during a screaming match the analysts witnessed.

I apologize if this is disjointed, but I simultaneously have so much to say and struggle to find the words that accurately portray how toxic of an environment it was. I became depressed for the first time in my life during my tenure there and lost almost all self-confidence. I worked with Veronica essentially around the clock for 14 months and know her to be a kind, thoughtful, and ethical friend and colleague. Before working at eBay she had dreams of becoming a police officer or attending law school. I urge you to consider the extreme circumstances when evaluating Veronica's sentencing.

Anneli Olausson